

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

LEGAL COUNSEL

Craig W. Albee, Federal Defender
Krista A. Halla-Valdes, First Assistant

Joseph A. Bugni, Madison Supervisor
John W. Champion
Shelley M. Fite
Anderson M. Gansner
Gabriela A. Leija
Peter R. Moyers
Ronnie V. Murray
Tom E. Phillip
Joshua D. Uller
Kelly A. Welsh

517 East Wisconsin
Suite 182
Milwaukee, Wisconsin 53202

Telephone 414-221-9900
Facsimile 414-221-9901

June 1, 2020

Honorable Pamela Pepper
US. District Judge
517 E. Wisconsin Avenue
Milwaukee, WI 53202

Re: *United States v. Yousef Barasneh*
Case No. 20-CR-26

Dear Judge Pepper:

The Court previously ordered the parties to file by May 29, 2020 a status report, indicating to the court their anticipated next steps. On that day, Assistant United States Attorney Ben Proctor reached out to me in an effort to provide the Court with that information. I was off that day and in northern Wisconsin and did not get back to him. It had been on my "get-done" list the day before, but get it done I did not. I apologize for the delay in responding to Mr. Proctor and getting this to the Court.

Although I previously believed we could have a signed plea agreement as of last week, we do not yet have one, though I am aware that the government desires to file a plea agreement with the Court as soon as possible. From the defense perspective, there remain several things we wish to try to do before signing off on a plea agreement. The social distancing we've all engaged in, while understandable and necessary, has also slowed our ability to achieve some of those goals. However, I still think we can achieve (or at least fully attempt them) during this time. Accordingly, I wish to take advantage of this continued pause in most hearings by asking that the Court order the parties, by June 26,

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2020, to either file a plea agreement or set forth in a letter to the Court what is the status of the case.

Sincerely,

s/ John W. Champion
John W. Champion

JWC